

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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**DIANE FARRIS**, Individually and as Fiduciary of  
the Estate of **JOHN GALLO**, Deceased,

Index No.  
Date of Filing: February 6, 2023

Plaintiff,

**SUMMONS**

-against-

Plaintiff designates  
NEW YORK COUNTY  
as the Place of Trial

**AVON PRODUCTS, INC.;**  
**AIR & LIQUID SYSTEMS CORPORATION,**  
sued as successor-by-merger to **BUFFALO**  
**PUMPS, INC.;**  
**A.O. SMITH CORPORATION;**  
**ARMSTRONG INTERNATIONAL, INC.;**  
**AS AMERICA, INC.;**  
**BARRETT'S MINERALS INC.;**  
**BASF CATALYSTS LLC**, sued individually and  
as successor-in-interest to **ENGELHARD**  
**CORPORATION** and its subsidiary **PITA**  
**REALTY LIMITED** successor-by-merger to  
**EASTERN MAGNESIA TALC COMPANY;**  
**BLOCK DRUG COMPANY, INC.**, sued  
individually and as successor-in-interest to **THE**  
**GOLD BOND STERILIZING POWDER**  
**COMPANY a/k/a THE GOLD BOND**  
**COMPANY;**  
**BRENNTAG NORTH AMERICA, INC.**, sued  
individually and as successor-in-interest to  
**MINERAL PIGMENT SOLUTIONS, INC.** and as  
successor-in-interest to **WHITTAKER CLARK &**  
**DANIELS, INC.;**  
**BRENNTAG SPECIALTIES LLC f/k/a**  
**BRENNTAG SPECIALTIES, INC. f/k/a**  
**MINERAL PIGMENT SOLUTIONS, INC.**, sued  
individually and as successor-in-interest to  
**WHITTAKER CLARK & DANIELS, INC.;**  
**BRISTOL-MYERS SQUIBB COMPANY**, sued  
individually and as successor-in-interest to  
**CHARLES OF THE RITZ;**  
**BURNHAM LLC f/k/a BURNHAM**  
**CORPORATION;**  
**BW/IP INTERNATIONAL, INC.**, sued  
individually and as successor-in-interest to  
**BYRON JACKSON PUMP COMPANY;**

Plaintiff resides at:  
27 Karen Drive  
Bloomingburg, NY 12721

**CARRIER CORPORATION;**  
**CARRIER GLOBAL CORPORATION;**  
**CHARLES B. CHRYSTAL COMPANY, INC.;**  
**CHATTEM, INC.** a subsidiary of SANOFI-AVENTIS U.S. LLC, sued individually and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY;  
**CLEAVER-BROOKS, INC.** f/k/a AQUA-CHEM, INC. d/b/a CLEAVER-BROOKS DIVISION, sued individually and as successor-in-interest to THE SPRINGFIELD BOILER COMPANY;  
**COLGATE-PALMOLIVE COMPANY;**  
**COLUMBIA BOILER COMPANY OF POTTSTOWN;**  
**CONOPCO, INC.,** a subsidiary of UNILEVER HOME & PERSONAL CARE USA;  
**CROSBY VALVE, LLC;**  
**DCO LLC** f/k/a DANA COMPANIES LLC, sued individually and as successor-in-interest to VICTOR GASKET MANUFACTURING COMPANY;  
**DAP PRODUCTS, INC.;**  
**EASTERN MAGNESIA TALC COMPANY;**  
**ECR INTERNATIONAL, INC.,** sued as successor to THE UTICA COMPANIES, INC.;  
**EDELBROCK, LLC** f/k/a EDELBROCK CORPORATION;  
**EMERSON ELECTRIC CO.;**  
**EMPIRE COMFORT SYSTEMS, INC.** f/k/a EMPIRE, INC.;  
**FEDERAL-MOGUL ASBESTOS PERSONAL INJURY TRUST** as successor to FELT-PRODUCTS MANUFACTURING CORPORATION;  
**FLOWERVE CORPORAION,** sued as successor-in-interest to INVENSYS SYSTEMS, INC. f/k/a BTR SIEBE PLC as successor-interest to ROCKWELL MANUFACTURING COMPANY, and as successor-by-merger to DURCO INTERNATIONAL;  
**FLOWERVE US, INC.,** sued as successor to EDWARD VALVE, INC., BW/IP

INTERNATIONAL, INC., and BYRON JACKSON PUMP COMPANY;  
**FMC CORPORATION**, sued individually and as successor-in-interest to PEERLESS PUMP COMPANY, CROSBY VALVE, LLC and CROSBY VALVE, INC.;  
**FORD MOTOR COMPANY**;  
**FOSTER WHEELER ENERGY CORPORATION**;  
**GARDNER DENVER, INC.**;  
**GENERAL ELECTRIC COMPANY**;  
**GENUINE PARTS COMPANY** a/k/a NAPA;  
**GG OF FLORIDA, INC.** f/k/a HIGBEE, INC. f/k/a HIGBEE GASKETS AND SEALING PRODUCTS, INC.;  
**GOULDS PUMPS LLC** f/k/a GOULDS PUMPS, INCORPORATED;  
**GOULDS PUMPS (N.Y.) INC.** f/k/a GOULDS PUMPS, INCORPORATED;  
**THE H.B. SMITH COMPANY, INCORPORATED**, a division of MESTEK, INC., and d/b/a SMITH CAST IRON BOILERS;  
**HENKEL CONSUMER GOODS INC.** and its former subsidiary THE DIAL CORPORATION;  
**HENKEL CORPORATION** and its former subsidiary THE DIAL CORPORATION;  
**HENRY COMPANY LLC**;  
**W.W. HENRY COMPANY**;  
**HOLLEY PERFORMANCE PRODUCTS, INC.**;  
**HOLLINGSWORTH & VOSE COMPANY**;  
**HONEYWELL INTERNATIONAL, INC.**, sued individually and f/k/a ALLIED-SIGNAL, INC. successor-in-interest to BENDIX CORPORATION;  
**HOPEMAN BROTHERS INC.**;  
**ITT, LLC** f/k/a ITT INC., ITT CORPORATION, and ITT INDUSTRIES, INC., sued individually and as successor-in-interest to BELL & GOSSETT;  
**JOHN CRANE, INC.**;  
**LENNOX INDUSTRIES, INC.**;  
**LENNOX INTERNATIONAL, INC.**;  
**MORSE TEC LLC** f/k/a BORGWARNER MORSE TEC LLC, sued as successor-by-merger to BORG WARNER CORPORATION;

**MUELLER COMPANY, LLC**, a subsidiary of  
MUELLER WATER PRODUCTS, INC.;  
**MW CUSTOM PAPERS, LLC** as successor-in-  
interest to THE MEAD CORPORATION;  
**PARAMOUNT GLOBAL** f/k/a VIACOMCBS  
INC. f/k/a CBS CORPORATION f/k/a VIACOM,  
INC. successor-by-merger to CBS  
CORPORATION f/k/a WESTINGHOUSE  
ELECTRIC CORPORATION;  
**PEERLESS INDUSTRIES INC.**;  
**PFIZER INC.**;  
**PNEUMO ABEX LLC**, sued as successor-in-  
interest to ABEX CORPORATION;  
**THE PROCTER & GAMBLE COMPANY**, sued  
individually and as successor-in-interest to THE  
GILLETTE COMPANY;  
**REDCO CORPORATION** f/k/a CRANE CO.;  
**RHEEM MANUFACTURING COMPANY**;  
**R. T. VANDERBILT HOLDING COMPANY,**  
**INC.**, sued individually and as successor-in-interest  
to R. T. VANDERBILT COMPANY, INC.;  
**SPECIALTY MINERALS INC.**, sued  
individually and as a subsidiary of MINERALS  
TECHNOLOGIES INC.;  
**STERLING FLUID SYSTEMS (USA), LLC**  
f/k/a PEERLESS PUMP CO.;  
**UNILEVER UNITED STATES, INC.**;  
**UNION CARBIDE CORPORATION**;  
**VANDERBILT MINERALS, LLC**, sued as  
successor-by-merger to R. T. VANDERBILT  
COMPANY, INC.;  
**VELAN VALVE CORP.** a/k/a VELAN VALVE  
CORPORATION;  
**VIAD CORP** f/k/a VIAD CORPORATION f/k/a  
THE DIAL CORPORATION, sued individually  
and as successor-in-interest to GRISCOM-  
RUSSELL COMPANY;  
**WARREN PUMPS, LLC**;  
**WATTS WATER TECHNOLOGIES, INC.**,  
sued as successor-in-interest to MUELLER  
STEAM SPECIALTY, INC.;  
**WEIL-MCLAIN**, a division of the MARLYE-  
WYLAIN COMPANY;  
**WEIR VALVES & CONTROLS USA, INC.**  
f/k/a ATWOOD & MORRILL;  
**WHITTAKER CLARK & DANIELS, INC.**;

**THE WILLIAM POWELL COMPANY;**  
**ZURN INDUSTRIES, LLC**, sued individually  
and as successor-in-interest to ZURN  
INDUSTRIES, INC. and ERIE CITY IRON  
WORKS d/b/a KEYSTONE BOILER WORKS,  
INC.,

Defendants.

**TO THE ABOVE-NAMED DEFENDANTS:**

You are hereby summoned to answer in this action and to serve a copy of your answer, or if the complaint is not served with this summons, exclusive of the day of service (or within 30 days after the service is complete if this Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: February 6, 2023  
New York, New York

SIMON GREENSTONE PANATIER, PC  
Attorneys for Plaintiff

**Brendan J. Tully**

Brendan J. Tully  
420 Lexington Avenue, Suite 2848  
New York, New York 10170  
Telephone: (212) 634-1690  
Facsimile: (212) 320-0526

**TO DEFENDANTS:****AVON PRODUCTS, INC.**

Secretary of State  
One Commerce Plaza  
99 Washington Avenue  
Albany, NY 12231-0001

**AIR & LIQUID SYSTEMS CORPORATION**, sued as successor-by-merger to BUFFALO PUMPS, INC.

Corporation Service Company  
80 State Street  
Albany, NY 12207-2543

**A.O. SMITH CORPORATION**

The Prentice-Hall Corporation System, Inc.  
80 State Street  
Albany, NY 12207

**ARMSTRONG INTERNATIONAL, INC.**

David Dykstra  
900 Maple Street  
Three Rivers, MI 49093

**AS AMERICA, INC.**

The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**BARRETTS MINERALS INC.**

CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**BASF CATALYSTS LLC**, sued individually and as successor-in-interest to ENGELHARD CORPORATION and its subsidiary PITA REALTY LIMITED successor-by-merger to EASTERN MAGNESIA TALC COMPANY

CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**BLOCK DRUG COMPANY, INC.**, sued individually and as successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY Corporation Service Company  
Princeton South Corporate Center, Suite 160  
100 Charles Ewing Boulevard  
Ewing, NJ 08628

**BRENNTAG NORTH AMERICA, INC.**, sued individually and as successor-in-interest to MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**BRENNTAG SPECIALTIES LLC** f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL PIGMENT SOLUTIONS, INC., sued individually and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.  
CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**BRISTOL-MYERS SQUIBB COMPANY**, sued individually and as successor-in-interest to CHARLES OF THE RITZ  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**BURNHAM LLC** f/k/a BURNHAM CORPORATION  
Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

**BW/IP INTERNATIONAL, INC.**, sued individually and as successor-in-interest to BYRON JACKSON PUMP COMPANY  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**CARRIER CORPORATION**  
United Agent Group Inc.  
600 Mamaroneck Avenue, Suite 400  
Harrison, NY 10528

**CARRIER GLOBAL CORPORATION**

The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**CHARLES B. CHRYSTAL COMPANY, INC.**

89 Coachlight Circle  
Prospect, CT 06712

**CHATTEM, INC.** a subsidiary of SANOFI-AVENTIS U.S. LLC, sued individually and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY  
Corporation Service Company  
2908 Poston Avenue  
Nashville, TN 37203-1312

**CLEAVER-BROOKS, INC.** f/k/a AQUA-CHEM, INC. d/b/a CLEAVER-BROOKS  
DIVISION, sued individually and as successor-in-interest to THE SPRINGFIELD BOILER  
COMPANY

Corporation Service Company  
80 State Street  
Albany, NY 12207-2543

**COLGATE-PALMOLIVE COMPANY**

CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**COLUMBIA BOILER COMPANY OF POTTSTOWN**

CT Corporation  
600 North Second Street, Suite 401  
Harrisburg, PA 17101

**CONOPCO, INC.**, a subsidiary of UNILEVER HOME & PERSONAL CARE USA

CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**CROSBY VALVE, LLC**

CT Corporation System  
701 S. Carson Street, Suite 200  
Carson City, NV 89701



**DCO LLC** f/k/a DANA COMPANIES LLC, sued individually and as successor-in-interest to  
VICTOR GASKET MANUFACTURING COMPANY

CT Corporation System  
4701 Cox Road, Suite 285  
Glen Allen, VA 23060

**DAP PRODUCTS, INC.**

Corporation Service Company  
80 State Street  
Albany, NY 12207-2543

**EASTERN MAGNESIA TALC COMPANY**

The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**ECR INTERNATIONAL, INC.**, sued as successor to THE UTICA COMPANIES, INC.

2201 Dwyer Avenue  
Utica, NY 13501

**EDELBROCK, LLC** f/k/a EDELBROCK CORPORATION

Ronald L. Coleman  
8649 Hacks Cross Road  
Olive Branch, MS 38654

**EMERSON ELECTRIC CO.**

Corporation Service Company  
80 State Street  
Albany, NY 12207-2543

**EMPIRE COMFORT SYSTEMS, INC.** f/k/a EMPIRE, INC.

Patrick B. Mathis  
23 Public Square, Suite 300  
Belleville, IL 62220

**FEDERAL-MOGUL ASBESTOS PERSONAL INJURY TRUST** as successor to FELT-  
PRODUCTS MANUFACTURING CORPORATION

Wilmington Trust SP Services, Inc.  
1105 N. Market Street, Suite 1300  
Wilmington, DE 19801

**FLOWERVE CORPORATION**, sued as successor-in-interest to INVENSYS SYSTEMS, INC. f/k/a BTR SIEBE PLC as successor-interest to ROCKWELL MANUFACTURING COMPANY, and as successor-by-merger to DURCO INTERNATIONAL CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**FLOWERVE US, INC.**, sued as successor to EDWARD VALVE, INC., BW/IP INTERNATIONAL, INC., and BYRON JACKSON PUMP COMPANY CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**FMC CORPORATION**, sued individually and as successor-in-interest to PEERLESS PUMP COMPANY, CROSBY VALVE, LLC and CROSBY VALVE, INC. CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**FORD MOTOR COMPANY**  
CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**FOSTER WHEELER ENERGY CORPORATION**  
United Agent Group Inc.  
600 Mamaroneck Avenue, Suite 400  
Harrison, NY 10528

**GARDNER DENVER, INC.**  
CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**GENERAL ELECTRIC COMPANY**  
Vice President, Litigation  
General Electric Company  
901 Main Avenue  
Norwalk, CT 06851

**GENUINE PARTS COMPANY** a/k/a NAPA  
CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**GG OF FLORIDA, INC. f/k/a HIGBEE, INC. f/k/a HIGBEE GASKETS AND SEALING PRODUCTS, INC.**

1728 Lane Avenue South  
Jacksonville, FL 32236.

**GOULDS PUMPS LLC f/k/a GOULDS PUMPS, INCORPORATED**

The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**GOULDS PUMPS (N.Y.) INC. f/k/a GOULDS PUMPS, INCORPORATED**

CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**THE H.B. SMITH COMPANY, INCORPORATED, a division of MESTEK, INC., and d/b/a SMITH CAST IRON BOILERS**

Edwin M. Smith  
61 Union Street, Suite 201  
Westfield, MA 01085

**HENKEL CONSUMER GOODS INC. and its former subsidiary THE DIAL CORPORATION**

Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

**HENKEL CORPORATION and its former subsidiary THE DIAL CORPORATION**

Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

**HENRY COMPANY LLC**

United Agent Group Inc.  
4640 Admiralty Way, 5th Floor  
Marina del Rey, CA 90292

**W.W. HENRY COMPANY**

400 Ardex Park Drive  
Aliquippa, PA 15001

**HOLLEY PERFORMANCE PRODUCTS, INC.**

Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

**HOLLINGSWORTH & VOSE COMPANY**

County Road 113  
Greenwich, NY 12834

**HONEYWELL INTERNATIONAL, INC.**, sued individually and f/k/a ALLIED-SIGNAL, INC. successor-in-interest to BENDIX CORPORATION

Corporation Service Company  
80 State Street  
Albany, NY 12207-2543

**HOPEMAN BROTHERS INC.**

CT Corporation Service  
4701 Cox Road, Suite 285  
Glen Allen, VA 23060

**ITT, LLC** f/k/a ITT INC., ITT CORPORATION, and ITT INDUSTRIES, INC., sued individually and as successor-in-interest to BELL & GOSSETT

CT Corporation System  
334 N. Senate Avenue  
Indianapolis, IN 46204

**JOHN CRANE, INC.**

CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**LENNOX INDUSTRIES, INC.**

Corporation Service Company  
80 State Street  
Albany, NY 12207-2543

**LENNOX INTERNATIONAL, INC.**

Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

**MORSE TEC LLC** f/k/a BORGWARNER MORSE TEC LLC, sued as successor-by-merger to BORG WARNER CORPORATION

CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**MUELLER COMPANY, LLC**, a subsidiary of MUELLER WATER PRODUCTS, INC.

The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**MW CUSTOM PAPERS, LLC** as successor-in-interest to THE MEAD CORPORATION

Corporation Service Company  
80 State Street  
Albany, NY 12207-2543

**PARAMOUNT GLOBAL** f/k/a VIACOMCBS INC. f/k/a CBS CORPORATION f/k/a VIACOM, INC. successor-by-merger to CBS CORPORATION f/k/a WESTINGHOUSE ELECTRIC CORPORATION

Corporation Service Company  
80 State Street  
Albany, NY 12207-2543

**PEERLESS INDUSTRIES INC.**

Philip J. O'Rourke, Esq.  
Lewis Brisbois Bisgaard & Smith, LLP  
77 Water Street, Suite 2100  
New York, NY 10005

**PFIZER INC.**

CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**PNEUMO ABEX LLC**, sued as successor-in-interest to ABEX CORPORATION

Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

**THE PROCTER & GAMBLE COMPANY**, sued individually and as successor-in-interest to THE GILLETTE COMPANY

CT Corporation System  
4400 Easton Commons, Fleet 125  
Columbus Ohio 43219

**REDCO CORPORATION** f/k/a CRANE CO.

The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**RHEEM MANUFACTURING COMPANY**

Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

**R. T. VANDERBILT HOLDING COMPANY, INC.**, sued individually and as successor-in-interest to R. T. VANDERBILT COMPANY, INC.

Corporation Service Company  
80 State Street  
Albany, NY 12207-2543

**SPECIALTY MINERALS INC.**, sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.

CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**STERLING FLUID SYSTEMS (USA), LLC** f/k/a PEERLESS PUMP CO.

The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street, Wilmington, DE 19801

**UNILEVER UNITED STATES, INC.**

The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**UNION CARBIDE CORPORATION**

CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**VANDERBILT MINERALS, LLC**, sued as successor-by-merger to R. T. VANDERBILT COMPANY, INC.

Corporation Service Company  
80 State Street  
Albany, NY 12207-2543

**VELAN VALVE CORP.** a/k/a VELAN VALVE CORPORATION

Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

**VIAD CORP** f/k/a VIAD CORPORATION f/k/a THE DIAL CORPORATION, sued individually and as successor-in-interest to GRISCOM-RUSSELL COMPANY  
CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**WARREN PUMPS, LLC**  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**WATTS WATER TECHNOLOGIES, INC.**, sued as successor-in-interest to MUELLER STEAM SPECIALTY, INC.  
CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**WEIL-MCLAIN**, a division of the MARLYE-WYLAIN COMPANY  
999 McClintock Drive, Suite 200  
Burr Ridge, IL 60527

**WEIR VALVES & CONTROLS USA, INC.** f/k/a ATWOOD & MORRILL  
29 Old Right Road  
Ipswich, MA 01938-1119

**WHITTAKER CLARK & DANIELS, INC.**  
Joe Cobuzio  
Tompkins, McGuire, Wacenfeld & Barry  
3 Becker Farm Road, 4th Floor  
Roseland, NJ 07068

**THE WILLIAM POWELL COMPANY**  
David R. Cowart  
3261 Spring Grove Avenue  
Cincinnati, OH 45225

**ZURN INDUSTRIES, LLC**, sued individually and as successor-in-interest to ZURN INDUSTRIES, INC. and ERIE CITY IRON WORKS d/b/a KEYSTONE BOILER WORKS, INC.  
CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

-----X  
**DIANE FARRIS**, Individually and as Fiduciary of the  
Estate of **JOHN GALLO**, Deceased,

Index No.

Date of Filing: February 6, 2023

Plaintiff,

**COMPLAINT**

-against-

Plaintiff demands a trial by jury.

**AVON PRODUCTS, INC.;**  
**AIR & LIQUID SYSTEMS CORPORATION**, sued  
as successor-by-merger to **BUFFALO PUMPS, INC.;**  
**A.O. SMITH CORPORATION;**  
**ARMSTRONG INTERNATIONAL, INC.;**  
**AS AMERICA, INC.;**  
**BARRETT'S MINERALS INC.;**  
**BASF CATALYSTS LLC**, sued individually and as  
successor-in-interest to **ENGELHARD**  
**CORPORATION** and its subsidiary **PITA REALTY**  
**LIMITED** successor-by-merger to **EASTERN**  
**MAGNESIA TALC COMPANY;**  
**BLOCK DRUG COMPANY, INC.**, sued individually  
and as successor-in-interest to **THE GOLD BOND**  
**STERILIZING POWDER COMPANY a/k/a THE**  
**GOLD BOND COMPANY;**  
**BRENNTAG NORTH AMERICA, INC.**, sued  
individually and as successor-in-interest to **MINERAL**  
**PIGMENT SOLUTIONS, INC.** and as successor-in-  
interest to **WHITTAKER CLARK & DANIELS, INC.;**  
**BRENNTAG SPECIALTIES LLC f/k/a**  
**BRENNTAG SPECIALTIES, INC. f/k/a MINERAL**  
**PIGMENT SOLUTIONS, INC.**, sued individually and  
as successor-in-interest to **WHITTAKER CLARK &**  
**DANIELS, INC.;**  
**BRISTOL-MYERS SQUIBB COMPANY**, sued  
individually and as successor-in-interest to **CHARLES**  
**OF THE RITZ;**  
**BURNHAM LLC f/k/a BURNHAM**  
**CORPORATION;**  
**BW/IP INTERNATIONAL, INC.**, sued individually  
and as successor-in-interest to **BYRON JACKSON**  
**PUMP COMPANY;**  
**CARRIER CORPORATION;**  
**CARRIER GLOBAL CORPORATION;**  
**CHARLES B. CHRYSTAL COMPANY, INC.;**



**CHATTEM, INC.** a subsidiary of SANOFI-AVENTIS U.S. LLC, sued individually and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY;  
**CLEAVER-BROOKS, INC.** f/k/a AQUA-CHEM, INC. d/b/a CLEAVER-BROOKS DIVISION, sued individually and as successor-in-interest to THE SPRINGFIELD BOILER COMPANY;  
**COLGATE-PALMOLIVE COMPANY;**  
**COLUMBIA BOILER COMPANY OF POTTSTOWN;**  
**CONOPCO, INC.,** a subsidiary of UNILEVER HOME & PERSONAL CARE USA;  
**CROSBY VALVE, LLC;**  
**DCO LLC** f/k/a DANA COMPANIES LLC, sued individually and as successor-in-interest to VICTOR GASKET MANUFACTURING COMPANY;  
**DAP PRODUCTS, INC.;**  
**EASTERN MAGNESIA TALC COMPANY;**  
**ECR INTERNATIONAL, INC.,** sued as successor to THE UTICA COMPANIES, INC.;;  
**EDELBROCK, LLC** f/k/a EDELBROCK CORPORATION;  
**EMERSON ELECTRIC CO.;**  
**EMPIRE COMFORT SYSTEMS, INC.** f/k/a EMPIRE, INC.;;  
**FEDERAL-MOGUL ASBESTOS PERSONAL INJURY TRUST** as successor to FELT-PRODUCTS MANUFACTURING CORPORATION;  
**FLOWERVE CORPORATION,** sued as successor-in-interest to INVENSYS SYSTEMS, INC. f/k/a BTR SIEBE PLC as successor-interest to ROCKWELL MANUFACTURING COMPANY, and as successor-by-merger to DURCO INTERNATIONAL;  
**FLOWERVE US, INC.,** sued as successor to EDWARD VALVE, INC., BW/IP INTERNATIONAL, INC., and BYRON JACKSON PUMP COMPANY;  
**FMC CORPORATION,** sued individually and as successor-in-interest to PEERLESS PUMP COMPANY, CROSBY VALVE, LLC and CROSBY VALVE, INC.;;  
**FORD MOTOR COMPANY;**  
**FOSTER WHEELER ENERGY CORPORATION;**

**GARDNER DENVER, INC.;**  
**GENERAL ELECTRIC COMPANY;**  
**GENUINE PARTS COMPANY** a/k/a NAPA;  
**GG OF FLORIDA, INC.** f/k/a HIGBEE, INC. f/k/a  
HIGBEE GASKETS AND SEALING PRODUCTS,  
INC.;  
**GOULDS PUMPS LLC** f/k/a GOULDS PUMPS,  
INCORPORATED;  
**GOULDS PUMPS (N.Y.) INC.** f/k/a GOULDS  
PUMPS, INCORPORATED;  
**THE H.B. SMITH COMPANY, INCORPORATED,**  
a division of MESTEK, INC., and d/b/a SMITH CAST  
IRON BOILERS;  
**HENKEL CONSUMER GOODS INC.** and its  
former subsidiary THE DIAL CORPORATION;  
**HENKEL CORPORATION** and its former  
subsidiary THE DIAL CORPORATION;  
**HENRY COMPANY LLC;**  
**W.W. HENRY COMPANY;**  
**HOLLEY PERFORMANCE PRODUCTS, INC.;**  
**HOLLINGSWORTH & VOSE COMPANY;**  
**HONEYWELL INTERNATIONAL, INC.,** sued  
individually and f/k/a ALLIED-SIGNAL, INC.  
successor-in-interest to BENDIX CORPORATION;  
**HOPEMAN BROTHERS INC.;**  
**ITT, LLC** f/k/a ITT INC., ITT CORPORATION, and  
ITT INDUSTRIES, INC., sued individually and as  
successor-in-interest to BELL & GOSSETT;  
**JOHN CRANE, INC.;**  
**LENNOX INDUSTRIES, INC.;**  
**LENNOX INTERNATIONAL, INC.;**  
**MORSE TEC LLC** f/k/a BORGWARNER MORSE  
TEC LLC, sued as successor-by-merger to BORG  
WARNER CORPORATION;  
**MUELLER COMPANY, LLC,** a subsidiary of  
MUELLER WATER PRODUCTS, INC.;  
**MW CUSTOM PAPERS, LLC** as successor-in-  
interest to THE MEAD CORPORATION;  
**PARAMOUNT GLOBAL** f/k/a VIACOMCBS INC.  
f/k/a CBS CORPORATION f/k/a VIACOM, INC.  
successor-by-merger to CBS CORPORATION f/k/a  
WESTINGHOUSE ELECTRIC CORPORATION;  
**PEERLESS INDUSTRIES INC.;**  
**PFIZER INC.;**  
**PNEUMO ABEX LLC,** sued as successor-in-interest  
to ABEX CORPORATION;

**THE PROCTER & GAMBLE COMPANY**, sued individually and as successor-in-interest to **THE GILLETTE COMPANY**;  
**REDCO CORPORATION** f/k/a **CRANE CO.**;  
**RHEEM MANUFACTURING COMPANY**;  
**R. T. VANDERBILT HOLDING COMPANY, INC.**, sued individually and as successor-in-interest to **R. T. VANDERBILT COMPANY, INC.**;  
**SPECIALTY MINERALS INC.**, sued individually and as a subsidiary of **MINERALS TECHNOLOGIES INC.**;  
**STERLING FLUID SYSTEMS (USA), LLC** f/k/a **PEERLESS PUMP CO.**;  
**UNILEVER UNITED STATES, INC.**;  
**UNION CARBIDE CORPORATION**;  
**VANDERBILT MINERALS, LLC**, sued as successor-by-merger to **R. T. VANDERBILT COMPANY, INC.**;  
**VELAN VALVE CORP.** a/k/a **VELAN VALVE CORPORATION**;  
**VIAD CORP** f/k/a **VIAD CORPORATION** f/k/a **THE DIAL CORPORATION**, sued individually and as successor-in-interest to **GRISCOM-RUSSELL COMPANY**;  
**WARREN PUMPS, LLC**;  
**WATTS WATER TECHNOLOGIES, INC.**, sued as successor-in-interest to **MUELLER STEAM SPECIALTY, INC.**;  
**WEIL-MCLAIN**, a division of the **MARLYE-WYLAIN COMPANY**;  
**WEIR VALVES & CONTROLS USA, INC.** f/k/a **ATWOOD & MORRILL**;  
**WHITTAKER CLARK & DANIELS, INC.**;  
**THE WILLIAM POWELL COMPANY**;  
**ZURN INDUSTRIES, LLC**, sued individually and as successor-in-interest to **ZURN INDUSTRIES, INC.** and **ERIE CITY IRON WORKS d/b/a KEYSTONE BOILER WORKS, INC.**,

Defendants.

**TO THE ABOVE-NAMED DEFENDANTS:**

Plaintiff **DIANE FARRIS**, Individually and as Fiduciary of the Estate of **JOHN GALLO**,

Deceased, by and through her attorneys, SIMON GREENSTONE PANATIER, PC, for her Complaint respectfully alleges:

1. Plaintiff repeats and realleges Simon Greenstone Panatier, PC's New York City Asbestos Litigation Standard Complaint No. 2 as if fully incorporated herein.<sup>1</sup>
2. Plaintiff resides at 27 Karen Drive, Bloomingburg, NY12721.
3. Decedent JOHN GALLO was diagnosed with malignant mesothelioma as a result of his regular and repeated exposure to asbestos from the Defendants' asbestos-containing and/or asbestos-contaminated products. Decedent was repeatedly exposed to asbestos from the Defendants' asbestos-containing and/or asbestos-contaminated products throughout his life in New York and was regularly and repeatedly exposed to the Defendants' asbestos-containing and/or asbestos-contaminated products manufactured and/or purchased in New York. Plaintiff meets the minimum requirement for activation into the active docket pursuant to the Case Management Order governing these actions.

### **PARTIES**

4. At all times relevant, Defendant **AVON PRODUCTS, INC.** was a corporation organized under the laws of the State of New York with its principal place of business in New York.
5. At all times relevant, Defendant **AIR & LIQUID SYSTEMS CORPORATION**, sued as successor-by-merger to BUFFALO PUMPS, INC., was a corporation organized under the laws of the State of Pennsylvania with its principal place of business in New York.

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<sup>1</sup> A copy of Simon Greenstone Panatier, PC's New York City Asbestos Litigation Standard Asbestos Complaint for Personal Injury No. 2 is attached hereto as Exhibit "A."

6. At all times relevant, Defendant **A.O. SMITH CORPORATION** was a corporation organized under the laws of the State of Delaware with its principal place of business in Wisconsin.

7. At all times relevant, Defendant **ARMSTRONG INTERNATIONAL, INC.** was a corporation organized under the laws of the State of Michigan with its principal place of business in Michigan.

8. At all times relevant, Defendant **AS AMERICA, INC.** was a corporation organized under the laws of the State of Delaware with its principal place of business in New Jersey.

9. At all times relevant, Defendant **BARRETT'S MINERALS INC.** was a corporation organized under the laws of the State of Delaware with its principal places of business in New York and Montana.

10. At all times relevant, Defendant **BASF CATALYSTS LLC**, sued individually and as successor-in-interest to ENGELHARD CORPORATION and its subsidiary PITA REALTY LIMITED successor-by-merger to EASTERN MAGNESIA TALC COMPANY, was a limited liability company organized under the laws of the State of Delaware with its principal place of business in New Jersey. The managing member of **BASF CATALYSTS LLC**, sued individually and as successor-in-interest to ENGELHARD CORPORATION and its subsidiary PITA REALTY LIMITED successor-by-merger to EASTERN MAGNESIA TALC COMPANY, is BASF Corporation, a Delaware corporation with its principal place of business in New Jersey. Defendant **BASF CATALYSTS LLC**, sued individually and as successor-in-interest to ENGELHARD CORPORATION and its subsidiary PITA REALTY LIMITED successor-by-merger to EASTERN MAGNESIA TALC COMPANY, is therefore a citizen of the States of Delaware and New Jersey.

11. At all times relevant, Defendant **BLOCK DRUG COMPANY, INC.**, sued individually and as successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY, was a corporation organized under the laws of the State of New Jersey with its principal place of business in New Jersey.

12. At all times relevant, Defendant **BRENNTAG NORTH AMERICA, INC.**, sued individually and as successor-in-interest to MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC., was a corporation organized under the laws of the State of Delaware with its principal place of business in Pennsylvania.

13. At all times relevant, Defendant **BRENNTAG SPECIALTIES LLC** f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL PIGMENT SOLUTIONS, INC., sued individually and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC., was a limited liability company organized under the laws of the State of Delaware with its principal place of business in New Jersey. Defendant **BRENNTAG SPECIALTIES LLC** f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL PIGMENT SOLUTIONS, INC., sued individually and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.'s sole member is Brenntag North America, Inc., a Delaware corporation with its principal place of business in the State of Pennsylvania. Defendant **BRENNTAG SPECIALTIES LLC** f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL PIGMENT SOLUTIONS, INC., sued individually and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC., is therefore a citizen of the States of Delaware and Pennsylvania.

14. At all times relevant, Defendant **BRISTOL-MYERS SQUIBB COMPANY**, sued individually and as successor-in-interest to CHARLES OF THE RITZ, was a corporation organized under the laws of the State of Delaware with its principal place of business in New York.

15. At all times relevant, Defendant **BURNHAM LLC** f/k/a BURNHAM CORPORATION was a limited liability company organized under the laws of the State of Delaware with its principal place of business in Pennsylvania. The managing members of Defendant BURNHAM LLC f/k/a BURNHAM CORPORATION are Jonathan R. Burnham and Walther Orozco who reside in Florida. Therefore Defendant BURNHAM LLC f/k/a BURNHAM CORPORATION is a citizen of the State of Florida.

16. At all times relevant, Defendant **BW/IP INTERNATIONAL, INC.**, sued individually and as successor-in-interest to BYRON JACKSON PUMP COMPANY, was a corporation organized under the laws of the State of Delaware with its principal place of business in Texas.

17. At all times relevant, Defendant **CARRIER CORPORATION** was a corporation organized under the laws of the State of Delaware with its principal place of business in Florida.

18. At all times relevant, Defendant **CARRIER GLOBAL CORPORATION** was a corporation organized under the laws of the State of Delaware with its principal place of business in Florida.

19. At all times relevant, Defendant **CHARLES B. CHRYSTAL COMPANY, INC.** was a corporation organized under the laws of the State of New York with its principal place of business in Connecticut.

20. At all times relevant, Defendant **CHATTEM, INC.** a subsidiary of SANOFI-AVENTIS U.S. LLC, sued individually and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY, was a corporation organized under the laws of the State of Tennessee with its principal place of business in Tennessee.

21. At all times relevant, Defendant **CLEAVER-BROOKS, INC.** f/k/a AQUA-CHEM, INC. d/b/a CLEAVER-BROOKS DIVISION, sued individually and as successor-in-interest to THE SPRINGFIELD BOILER COMPANY, was a corporation organized under the laws of the State of Delaware with its principal place of business in Georgia.

22. At all times relevant, Defendant **COLGATE-PALMOLIVE COMPANY** was a corporation organized under the laws of the State of Delaware with its principal place of business in New York.

23. At all times relevant, Defendant **COLUMBIA BOILER COMPANY OF POTTSTOWN** was a corporation organized under the laws of the State of Pennsylvania with its principal place of business in Pennsylvania.

24. At all times relevant, Defendant **CONOPCO, INC.**, a subsidiary of UNILEVER HOME & PERSONAL CARE USA, was a corporation organized under the laws of the State of New York with its principal place of business in New Jersey.

25. At all times relevant, Defendant **CROSBY VALVE, LLC** was a limited liability company organized under the laws of the State of Nevada with its principal place of business in Minnesota. Defendant **CROSBY VALVE, LLC** is a wholly-owned subsidiary of The J.R. Clarkson Company, LLC, and is an indirect wholly-owned subsidiary of Emerson Electric Co. Emerson Electric Co. is incorporated in Missouri with its principal place of business in Missouri. Defendant **CROSBY VALVE, LLC** is therefore a citizen of the State of Missouri.

26. At all times relevant, Defendant **DCO LLC** f/k/a DANA COMPANIES LLC, sued individually and as successor-in-interest to VICTOR GASKET MANUFACTURING COMPANY, was a limited liability company organized under the laws of the State of Virginia with its principal place of business in New Jersey. To the best of Plaintiff's knowledge, the



managing members of **DCO LLC** f/k/a DANA COMPANIES LLC, sued individually and as successor-in-interest to VICTOR GASKET MANUFACTURING COMPANY, are Vicki L. Stringham and Joseph A. Stancati who reside in Ohio. Therefore Defendant **DCO LLC** f/k/a DANA COMPANIES LLC, sued individually and as successor-in-interest to VICTOR GASKET MANUFACTURING COMPANY, is a citizen of the State of Ohio.

27. At all times relevant, Defendant **DAP PRODUCTS, INC.** was a corporation organized under the laws of the State of Delaware with its principal place of business in Maryland.

28. At all times relevant, Defendant **EASTERN MAGNESIA TALC COMPANY** was a corporation organized under the laws of the State of Delaware with its principal place of business in Delaware.

29. At all times relevant, Defendant **ECR INTERNATIONAL, INC.**, sued as successor to THE UTICA COMPANIES, INC., was a corporation organized under the laws of the State of New York with its principal place of business in New York.

30. At all times relevant, Defendant **EDELBROCK, LLC** f/k/a EDELBROCK CORPORATION, was a limited liability company organized under the laws of the State of Mississippi with its principal place of business in Mississippi.

31. At all times relevant, Defendant **EMERSON ELECTRIC CO.** was a corporation organized under the laws of the State of Missouri with its principal place of business in Missouri.

32. At all times relevant, Defendant **EMPIRE COMFORT SYSTEMS, INC.** f/k/a EMPIRE, INC. was a corporation organized under the laws of the State of Illinois with its principal place of business in Illinois.

33. At all times relevant, Defendant **FEDERAL-MOGUL ASBESTOS PERSONAL INJURY TRUST** as successor to FELT-PRODUCTS MANUFACTURING CORPORATION

was an entity organized under the laws of the State of Delaware with its principal place of business in Delaware.

34. At all times relevant, Defendant **FLOWERVE CORPORATION**, sued as successor-in-interest to INVENSYS SYSTEMS, INC. f/k/a BTR SIEBE PLC as successor-interest to ROCKWELL MANUFACTURING COMPANY, and as successor-by-merger to DURCO INTERNATIONAL, was a corporation organized under the laws of the State of New York with its principal place of business in Texas.

35. At all times relevant, Defendant **FLOWERVE US, INC.**, sued as successor to EDWARD VALVE, INC., BW/IP INTERNATIONAL, INC., and BYRON JACKSON PUMP COMPANY, was a corporation organized under the laws of the State of Delaware with its principal place of business in Texas.

36. At all times relevant, Defendant **FMC CORPORATION**, sued individually and as successor-in-interest to PEERLESS PUMP COMPANY, CROSBY VALVE, LLC and CROSBY VALVE, INC., was a corporation organized under the laws of the State of Delaware with its principal place of business in Pennsylvania.

37. At all times relevant, Defendant **FORD MOTOR COMPANY** was a corporation organized under the laws of the State of Delaware with its principal place of business in Michigan. **FORD MOTOR COMPANY** specifically designed its braking systems for asbestos-containing brake linings such that no other material could be utilized as brake linings in those systems.

38. At all times relevant, Defendant **FOSTER WHEELER ENERGY CORPORATION** was a corporation organized under the laws of the State of Delaware with its principal place of business in New Jersey.

39. At all times relevant, Defendant **GARDNER DENVER, INC.** was a corporation organized under the laws of the State of Delaware with its principal place of business in Illinois.

40. At all times relevant, Defendant **GENERAL ELECTRIC COMPANY** was a corporation organized under the laws of the State of New York with its principal place of business in Massachusetts.

41. At all times relevant, Defendant **GENUINE PARTS COMPANY** a/k/a NAPA was a corporation organized under the laws of the State of Georgia with its principal place of business in Georgia.

42. At all times relevant, Defendant **GG OF FLORIDA, INC.** f/k/a HIGBEE, INC. f/k/a HIGBEE GASKETS AND SEALING PRODUCTS, INC. was a corporation organized under the laws of the State of New York with its principal place of business in Florida.

43. At all times relevant, Defendant **GOULDS PUMPS LLC** f/k/a GOULDS PUMPS, INCORPORATED was a limited liability company organized under the laws of the State of Delaware with its principal place of business in New York. The managing member of Defendant **GOULDS PUMPS LLC** f/k/a GOULDS PUMPS, INCORPORATED is InTelCo Management, LLC, whose sole member is ITT Inc., an Indiana corporation with its principal place of business in New York. Therefore Defendant **GOULDS PUMPS LLC** f/k/a GOULDS PUMPS, INCORPORATED is a citizen of the States of Indiana and New York.

44. At all times relevant, Defendant **GOULDS PUMPS (N.Y.) INC.** f/k/a GOULDS PUMPS, INCORPORATED was a corporation organized under the laws of the State of New York with its principal place of business in New York.

45. At all times relevant, Defendant **THE H.B. SMITH COMPANY, INCORPORATED**, a division of MESTEK, INC., and d/b/a SMITH CAST IRON BOILERS,

was a corporation organized under the laws of the State of Massachusetts with its principal place of business in Massachusetts.

46. At all times relevant, Defendant **HENKEL CONSUMER GOODS INC.** and its former subsidiary THE DIAL CORPORATION was a corporation organized under the laws of the State of Delaware with its principal place of business in Connecticut.

47. At all times relevant, Defendant **HENKEL CORPORATION** and its former subsidiary THE DIAL CORPORATION was a corporation organized under the laws of the State of Delaware with its principal place of business in Connecticut.

48. At all times relevant, Defendant **HENRY COMPANY LLC** was a limited liability company organized under the laws of the State of California with its principal place of business in California. The managing member of **HENRY COMPANY LLC** is Henry Holdings II, Inc., a Delaware corporation with its principal place of business in California. Defendant **HENRY COMPANY LLC** is therefore a citizen of the States of Delaware and California.

49. At all times relevant, Defendant **W.W. HENRY COMPANY** was a corporation organized under the laws of the State of California with its principal place of business in Pennsylvania.

50. At all times relevant, Defendant **HOLLEY PERFORMANCE PRODUCTS, INC.** was a corporation organized under the laws of the State of Delaware with its principal place of business in Kentucky.

51. At all times relevant, Defendant **HOLLINGSWORTH & VOSE COMPANY** was a corporation organized under the laws of the State of Massachusetts with its principal place of business in Massachusetts.

52. At all times relevant, Defendant **HONEYWELL INTERNATIONAL, INC.**, sued individually and f/k/a **ALLIED-SIGNAL, INC.** successor-in-interest to **BENDIX CORPORATION**, was a corporation organized under the laws of the State of Delaware with its principal place of business in North Carolina.

53. At all times relevant, Defendant **HOPEMAN BROTHERS INC.** was a corporation organized under the laws of the State of Virginia with its principal place of business in Virginia.

54. At all times relevant, Defendant **ITT, LLC** f/k/a **ITT INC.**, **ITT CORPORATION**, and **ITT INDUSTRIES, INC.**, sued individually and as successor-in-interest to **BELL & GOSSETT**, was a limited liability company organized under the laws of the State of Indiana with its principal place of business in New York. The managing member of Defendant **ITT, LLC** f/k/a **ITT INC.**, **ITT CORPORATION**, and **ITT INDUSTRIES, INC.**, sued individually and as successor-in-interest to **BELL & GOSSETT**, is **ITT Inc.**, an Indiana corporation with its principal place of business in New York, Defendant **ITT, LLC** f/k/a **ITT INC.**, **ITT CORPORATION**, and **ITT INDUSTRIES, INC.**, sued individually and as successor-in-interest to **BELL & GOSSETT**, is therefore a citizen of the States of New York and Indiana.

55. At all times relevant, Defendant **JOHN CRANE, INC.** was a corporation organized under the laws of the State of Delaware with its principal place of business in Illinois.

56. At all times relevant, Defendant **LENNOX INDUSTRIES, INC.** was a corporation organized under the laws of the State of Delaware with its principal place of business in Texas.

57. At all times relevant, Defendant **LENNOX INTERNATIONAL, INC.** was a corporation organized under the laws of the State of Delaware with its principal place of business in Texas.

58. At all times relevant, Defendant **MORSE TEC LLC** f/k/a BORGWARNER MORSE TEC LLC, sued as successor-by-merger to BORG WARNER CORPORATION, was a limited liability company organized under the laws of the State of Delaware with its principal place of business in New York. The managing member of Defendant **MORSE TEC LLC** f/k/a BORGWARNER MORSE TEC LLC, sued as successor-by-merger to BORG WARNER CORPORATION, is Borgwarner Inc., a Delaware corporation with its principal place of business in Michigan. Therefore, Defendant **MORSE TEC LLC** f/k/a BORGWARNER MORSE TEC LLC, sued as successor-by-merger to BORG WARNER CORPORATION, is a resident of the States of Delaware and Michigan.

59. At all times relevant, Defendant **MUELLER COMPANY, LLC**, a subsidiary of MUELLER WATER PRODUCTS, INC., was a limited liability company organized under the laws of the State of Delaware with its principal place of business in Tennessee. The managing member of **MUELLER COMPANY, LLC**, a subsidiary of MUELLER WATER PRODUCTS, INC. is Mueller Group, LLC. Mueller Group, LLC's managing member is Mueller Water Products, Inc., a Delaware corporation with its principal place of business in Georgia. Defendant **MUELLER COMPANY, LLC**, a subsidiary of MUELLER WATER PRODUCTS, INC. is therefore a citizen of the States of Delaware and Georgia.

60. At all times relevant, Defendant **MW CUSTOM PAPERS, LLC** as successor-in-interest to THE MEAD CORPORATION was a limited liability company organized under the laws of the State of Delaware with its principal place of business in Georgia. The sole member of

**MW CUSTOM PAPERS, LLC** as successor-in-interest to THE MEAD CORPORATION is WestRock MWV, LLC, whose sole member is WestRock Company. WestRock Company is a Delaware corporation with its principal place of business in Georgia. Defendant **MW CUSTOM PAPERS, LLC** as successor-in-interest to THE MEAD CORPORATION is therefore a citizen of the States of Delaware and Georgia.

61. At all times relevant, Defendant **PARAMOUNT GLOBAL** f/k/a VIACOMCBS INC. f/k/a CBS CORPORATION f/k/a VIACOM, INC. successor-by-merger to CBS CORPORATION f/k/a WESTINGHOUSE ELECTRIC CORPORATION was a corporation organized under the laws of the State of Delaware with its principal place of business in New York.

62. At all times relevant, Defendant **PEERLESS INDUSTRIES INC.** was a corporation organized under the laws of the State of Pennsylvania with its principal place of business in New York.

63. At all times relevant, Defendant **PFIZER INC.** was a corporation organized under the laws of the State of Delaware with its principal place of business in New York.

64. At all times relevant, Defendant **PNEUMO ABEX LLC**, sued as successor-in-interest to ABEX CORPORATION. was a limited liability company organized under the laws of the State of Delaware with its principal place of business in New Jersey.

65. At all times relevant, Defendant **THE PROCTER & GAMBLE COMPANY**, sued individually and as successor-in-interest to THE GILLETTE COMPANY, was a corporation organized under the laws of the State of Ohio with its principal place of business in Ohio.

66. At all times relevant, Defendant **REDCO CORPORATION** f/k/a CRANE CO. was a corporation organized under the laws of the State of Delaware with its principal place of business in Connecticut.

67. At all times relevant, Defendant **RHEEM MANUFACTURING COMPANY** was a corporation organized under the laws of the State of Delaware with its principal place of business in Georgia.

68. At all times relevant, Defendant **R. T. VANDERBILT HOLDING COMPANY, INC.**, sued individually and as successor-in-interest to R. T. VANDERBILT COMPANY, INC., was a corporation organized under the laws of the State of Delaware with its principal place of business in Connecticut.

69. At all times relevant, Defendant **SPECIALTY MINERALS INC.**, sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC., was a corporation organized under the laws of the State of Delaware with its principal place of business in Pennsylvania.

70. At all times relevant, Defendant **STERLING FLUID SYSTEMS (USA), LLC** f/k/a PEERLESS PUMP CO. was a limited liability company organized under the laws of the State of Delaware with its principal place of business in Indiana.

71. At all times relevant, Defendant **UNILEVER UNITED STATES, INC.** was a corporation organized under the laws of the State of Delaware with its principal place of business in New Jersey.

72. At all times relevant, Defendant **UNION CARBIDE CORPORATION** was a corporation organized under the laws of the State of New York with its principal place of business in Texas.

73. At all times relevant, Defendant **VANDERBILT MINERALS, LLC**, sued as successor-by-merger to R. T. VANDERBILT COMPANY, INC., was a limited liability company organized under the laws of the State of Delaware with its principal place of business in



Connecticut. The members of Defendant **VANDERBILT MINERALS, LLC**, sued as successor-by-merger to R. T. VANDERBILT COMPANY, INC., are Hugh B. Vanderbilt, Jr., Joseph Denaro and Paul Vanderbilt and who reside in Greenwich, Connecticut, and Randall L. Johnson who resides in Monroe, Connecticut. Defendant **VANDERBILT MINERALS, LLC**, sued as successor-by-merger to R. T. VANDERBILT COMPANY, INC., is therefore a citizen of the State of Connecticut.

74. At all times relevant, Defendant **VELAN VALVE CORP.** a/k/a VELAN VALVE CORPORATION was a corporation organized under the laws of the State of Delaware with its principal place of business in Vermont.

75. At all times relevant, Defendant **VIAD CORP** f/k/a VIAD CORPORATION f/k/a THE DIAL CORPORATION, sued individually and as successor-in-interest to GRISCOM-RUSSELL COMPANY, was a corporation organized under the laws of the State of Delaware with its principal place of business in Arizona.

76. At all times relevant, Defendant **WARREN PUMPS, LLC** was a limited liability company organized under the laws of the State of Delaware with its principal place of business in Massachusetts. The managing member of Defendant **WARREN PUMPS, LLC** is Colfax Corporation, a Delaware corporation with its principal place of business in Maryland. Therefore, Defendant **WARREN PUMPS, LLC** is a citizen of the States of Delaware and Maryland.

77. At all times relevant, Defendant **WATTS WATER TECHNOLOGIES, INC.**, sued as successor-in-interest to MUELLER STEAM SPECIALTY, INC., was a corporation organized under the laws of the State of Delaware with its principal place of business in Massachusetts.

78. At all times relevant, Defendant **WEIL-MCLAIN**, a division of the MARLYE-WYLAIN COMPANY, was a corporation organized under the laws of the State of Ohio with its principal place of business in Illinois.

79. At all times relevant, Defendant **WEIR VALVES & CONTROLS USA, INC.** f/k/a ATWOOD & MORRILL was a corporation organized under the laws of the State of Massachusetts with its principal place of business in Massachusetts.

80. At all times relevant, Defendant **WHITTAKER CLARK & DANIELS, INC.** was a corporation organized under the laws of the State of New Jersey with its principal place of business in New Jersey.

81. At all times relevant, Defendant **THE WILLIAM POWELL COMPANY** was a corporation organized under the laws of the State of Ohio with its principal place of business in Ohio.

82. At all times relevant, Defendant **ZURN INDUSTRIES, LLC**, sued individually and as successor-in-interest to ZURN INDUSTRIES, INC. and ERIE CITY IRON WORKS d/b/a KEYSTONE BOILER WORKS, INC., was a limited liability company organized under the laws of the State of Delaware with its principal place of business in Pennsylvania. The managing member of Defendant **ZURN INDUSTRIES, LLC**, sued individually and as successor-in-interest to ZURN INDUSTRIES, INC. and ERIE CITY IRON WORKS d/b/a KEYSTONE BOILER WORKS, INC., is Zurn Holdings, Inc., a Delaware corporation with its principal place of business in Wisconsin. Defendant **ZURN INDUSTRIES, LLC**, sued individually and as successor-in-interest to ZURN INDUSTRIES, INC. and ERIE CITY IRON WORKS d/b/a KEYSTONE BOILER WORKS, INC., is therefore a citizen of the States of Delaware and Wisconsin.

### **AUTHORIZATIONS**

83. Plaintiff will provide authorizations for Social Security records to Record Trak shortly.

WHEREFORE, Plaintiff demands judgment against Defendants on the causes of action herein and incorporated by reference in Simon Greenstone Panatier, PC's New York City Asbestos Litigation Standard Complaint for Personal Injury No. 2, in an amount exceeding the jurisdictional limits of all lower Courts, together with the costs and disbursements of this action.

Dated: February 6, 2023  
New York, New York

SIMON GREENSTONE PANATIER, PC  
Attorneys for Plaintiff

**Brendan J. Tully**

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